IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

TRIAD MOTORS, LTD. § d/b/a HOVEY MOTOR CARS, §

DEBTOR § CHAPTER 7

NOTICE OF EXPEDITED HEARING ON SECURITY SERVICE FEDERAL CREDIT UNION'S MOTION FOR RELIEF FROM AUTOMATIC STAY AGAINST PROPERTY PER 11 U.S.C. §362(d) OF THE BANKRUPTCY CODE AND LOCAL RULE 4001 AND FOR ADEQUATE PROTECTION (re DKTS. 107)

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that an expedited hearing on the motion of Security Service Federal Credit Union ("SSFCU") for Motion for Relief from Automatic Stay Against Property Pursuant to 11 U.S.C. §362(d) of the Bankruptcy Code and Local Rule 4001 and for Adequate Protection ("Motion") [Dkt. 107] has been set for hearing on Monday, August 19, 2024, at 10:00 o'clock a.m. in U.S. Bankruptcy Court, Western District of Texas, San Antonio Division, Courtroom No. 1, 3rd Floor, Hipolito F. Garcia Federal Bldg., 615 E. Houston Street, San Antonio, TX 78205.

Respectfully Submitted,

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> Elizabeth G. Smith State Bar No. 18577200

Attorney for Security Service Federal Credit Union

CERTIFICATE OF SERVICE

I certify that on August 9, 2024, a true and correct copy of the above and foregoing Notice of Expedited Hearing on Security Service Federal Credit Union's Motion for Relief from Automatic Stay Against Property Pursuant to 11 U.S.C. §362(d) of the Bankruptcy Code and Local Rule 4001 and for Adequate Protection was served to the Debtor, Debtor's counsel, the Ch7 Trustee, the U.S. Trustee, the parties who have filed their appearance in this case shown below, and all parties listed in the Service List attached hereto either through the Court's ECF system or via U.S. First Class Mail, postage prepaid:

by E-Notice of their appearance in this case as follows:

Debtor's Attorney, James S. Wilkins, Wilkins & Wilkins, L.L.P., 1100 NW Loop 410, Suite 700 San Antonio, TX 78213, jwilkins@stic.net

Jose C. Rodriguez, Chapter 7 Trustee, 1101 W. 34th Street, #223, Austin, TX 78705 jcrodlaw@gmail.com

U.S. Trustee, Jeremy Shane Flannery, 615 E. Houston, Suite 533, San Antonio, TX 78205, jeremy.s.flannery@usdoj.gov; Aubrey.Thomas@usdoj.gov; Erin.Coughlin@usdoj.gov

NextGear Capital, Inc., c/o Greenberg Traurig, LLP, Attn: John D. Elrod, 333 Piedmont Rd NE, Suite 2500, Atlanta, GA 30305-1780; elrodj@gtlaw.com

Miguel Espinoza c/o Gerrit Schulze, 13750 San Pedro, Suite 810, San Antonio, TX 78232 gerrit@txsuits.com;

United Texas Credit Union c/o D. Wade Hayden, Hayden & Cunningham, PLLC, 7750 Broadway, San Antonio, TX 78209 whayden@7750law.com

XL Funding, LLC d/b/a Axel Funding c/o Mark W. Stout or Owen C. Babcock, Padfield & Stout, LLP, 100 Throckmorton Street, Suite 700, Fort Worth, TX 76102, mstout@padfieldstout.com; obabcock@padfieldstout.com;

Steele CJDR Gonzales, LLC: Frances A. Smith, Ross, Smith & Binford, PC, 700 N. Pearl St., Suite 1610, Dallas, TX 75201, Frances.smith@rsbfirm.com; jonathan.gitlin@rsbfirm.com

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American Express National Bank c/o Jonathan Arias, Zwicker & Associates, P.C., 80 Minuteman Rd., P.O. Box 9043, Andover, MA 01810-1041 bknotices@zwickerpc.com

by First Class Mail as follows:

Debtor: Triad Motors, Ltd., 30775 IH 10 West, Boerne, TX 78006; and, to those parties per the attached Service List

Dated: August 9, 2024.

By: /s/ Elizabeth G. Smith
Elizabeth G. Smith

Attorney for Security Service Federal Credit Union

Label Matrix for local noticing 0542-5 Case 24-50876-mmp Western District of Texas San Antonio Fri Aug 9 10:35:41 CDT 2024 ADMIRAL PROPERTIES OF TEXAS 30775 IH 10 WEST Triad Motors Ltd. 30775 IH-10 West Boerne, TX 78006-9211

U.S. BANKRUPTCY COURT 615 E. HOUSTON STREET, ROOM 597 SAN ANTONIO, TX 78205-2055

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